

AO 91 (Rev. 11/11) Criminal Complaint

UNITED STATES DISTRICT COURT

for the

Eastern District of Virginia



United States of America

v.

Shehzadkhan Khandadkhan Pathan

Case No. 3:19mj213

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of _____ in the county of _____ Chesterfield _____ in the
Eastern District of _____ Virginia _____, the defendant(s) violated:

Code Section

Offense Description

18 U.S.C. §§ 1341 and 2

Mail Fraud, and Aiding and Abetting (May 23, 2019)

18 U.S.C. § 1349

Conspiracy to Commit Mail and Wire Fraud (From on or about May 2, 2019, to June 14, 2019)

18 U.S.C. §§ 1028A and 2

Aggravated Identity Theft, and Aiding and Abetting (June 14, 2019)

This criminal complaint is based on these facts:

See attached affidavit

☒ Continued on the attached sheet.

Complainant's signature

Michael J. McGillicuddy, FBI Special Agent

Printed name and title

Sworn to before me and signed in my presence.

Date: December 9, 2019

Judge's signature

City and state: Richmond, Virginia

Roderick C. Young, United States Magistrate Judge

Printed name and title

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, Michael J. McGillicuddy, being first duly sworn, hereby depose and state as follows:

INTRODUCTION AND AGENT BACKGROUND

1. I am a Special Agent with the Federal Bureau of Investigation (FBI), assigned to its Washington Field Office, Northern Virginia Resident Agency. I have been employed by the FBI for more than 14 years. From March 2015 through August 2016, I was a Supervisory Special Agent with the Money Laundering Unit at FBI Headquarters with oversight over the FBI's Money Laundering and Asset Forfeiture programs, among other programs. I am currently assigned to a squad which has investigative responsibility for fraud-based crimes and other economic crimes. I have participated in numerous criminal investigations to include violations related to corporate fraud, securities fraud, mail fraud, wire fraud, money laundering, and obstruction of justice. Prior to joining the FBI, I was a forensic accountant for an economic consulting firm. I am a Certified Public Accountant and a Certified Fraud Examiner.

2. I make this affidavit in support of a criminal complaint charging Shehzadkhan Khandadkhan Pathan, DOB [REDACTED]/1981 (hereafter "PATHAN") with: mail fraud, and aiding and abetting mail fraud, in violation of 18 U.S.C. §§ 1341 and 2; conspiracy to commit mail and wire fraud, in violation of 18 U.S.C. § 1349; and aggravated identity theft, and aiding and abetting aggravated identity theft, in violation of 18 U.S.C. §§ 1028A and 2.

3. The facts in this affidavit come from my personal observations, my training and experience, and information obtained from other agents and witnesses. This affidavit

is being submitted for the limited purpose to show merely that there is sufficient probable cause for the requested complaint and arrest warrant and does not set forth all of my knowledge about this investigation. I have set forth facts that I believe are sufficient to charge PATHAN with the criminal conduct set forth herein. The legal authorities cited herein have been provided based on review of this affidavit and follow-on discussions with the Assistant United States Attorney assigned to the case.

RELEVANT STATUTORY PROVISIONS

1. **Mail Fraud:** Title 18, United States Code, Section 1341 provides in pertinent part:

Whoever, having devised or intending to devise any scheme or artifice to defraud, or for obtaining money or property by means of false or fraudulent pretenses, representations, or promise . . . for the purpose of executing such scheme or artifice or attempting so to do, places in any post office or authorized depository for mail matter, any matter or thing whatever to be sent or delivered by the Postal Service, or deposits or causes to be deposited any matter or thing whatever to be sent or delivered by any private or commercial interstate carrier, or takes or receives therefrom, any such matter or thing, or knowingly causes to be delivered by mail or such carrier according to the direction thereon . . . shall be fined under this title or imprisoned not more than 20 years, or both.

2. **Wire Fraud:** Title 18, United States Code, Section 1343 provides in pertinent part:

Whoever, having devised or intending to devise any scheme or artifice to defraud, or for obtaining money or property by means of false or fraudulent pretenses, representations, or promises, transmits or causes to be transmitted by means of wire, radio, or television communication in interstate or foreign commerce, any writings, signs, signals, pictures, or sounds for the purpose of executing such scheme or artifice, shall be fined under this title or imprisoned not more than 20 years, or both.

3. **Conspiracy to Commit Mail and Wire Fraud:** Title 18, United States

Code, Section, 1349 provides:

Any person who attempts or conspires to commit [wire fraud] shall be subject to the same penalties as those prescribed for the offense, the commission of which was the object of the attempt or conspiracy.

4. **Aggravated Identity Theft:** Title 18, United States Code, Section 1028A

provides in pertinent part that whoever, during and in relation to any felony violation enumerated in subsection (c), knowingly transfers, possesses, or uses, without lawful authority, a means of identification of another person shall, in addition to the punishment provided for such felony, be sentenced to a term of imprisonment of 2 years.

5. **Predicate Felony Offenses for Aggravated Identity Theft:** Wire fraud

and conspiracy to commit wire fraud qualify as predicate felony offenses for aggravated identity theft pursuant to 18 U.S.C. § 1028A(c)(6).

6. **“Means of identification,”** as defined in 18 U.S.C. § 1028(d)(7), means

any name or number that may be used, alone or in conjunction with any other information, to identify a specific individual, including any— (A) name, social security number, date of birth, official State or government issued driver’s license or identification number, alien registration number, government passport number, employer or taxpayer identification number; (B) unique biometric data, such as fingerprint, voice print, retina or iris image, or other unique physical representation; (C) unique electronic identification number, address, or routing code; or (D) telecommunication identifying information or access device (emphasis added);

7. **Venue for Prosecuting Aggravated Identity Theft:** For the purposes of

prosecuting aggravated identity theft, venue is proper in any district(s) where the predicate

felony offense was committed, even if the means of identification of another person was not transferred, possessed, or used in that district. For predicate offenses that are continuing offenses, such as mail fraud and conspiracy to commit mail and wire fraud, venue may lie in any district where that crime was begun, continued, or completed. Because the commission of a predicate felony offenses is an essential element of a section 1028A offense, venue properly lies with respect to an aggravated identity theft offense in any district in which venue lies for the predicate offense. *See United States v. Magassouba*, 619 F.3d 202, 204 (2d Cir. 2010) (holding venue is proper in a prosecution for aggravated identity theft in any district where the predicate felony offense was committed).

PROBABLE CAUSE

8. This investigation involves a fraud scheme that is currently fashionable and being perpetrated by multiple criminal groups both nationally and internationally. The perpetrators use a variety of schemes to trick or coerce victims into providing them money. Initial contact with victims is typically made with automated, previously recorded phone calls, commonly referred to as “robocalls,” that contain misleading messages that often include callback numbers for the victim to contact. Once contact is established with a victim, a real person in the conspiracy will speak with the victim. One common technique used by the perpetrators is to offer the victim maintenance assistance with their home computer, or convincing the victim that there is a problem with their home computer, sometimes by tricking them into downloading software that the perpetrators use to actually create problems with the victim’s computer. With regard to the victims identified in this particular investigation, a more common scheme involved messages that creating a sense

of urgency by telling recipients that they have some sort of serious legal problem, and that if they did not immediately take a particular action demanded by the callers then there would be drastic consequences, typically involving the arrest of the call recipients and/or significant financial penalties. The fraudsters almost invariably instructed the call recipients that in order to prevent these dire consequences the recipients must pay money, by wire transfer or cash, to some supposed government entity.

9. On June 21, 2019, an agent from the FBI interviewed **VICTIM #1** from Chesterfield, Virginia. **VICTIM #1** is a retired 66-year-old female living with her 33-year-old special needs son. On or about May 2, 2019, **VICTIM #1** was telephonically contacted by individuals claiming to be agents with the Drug Enforcement Administration (DEA). The individuals falsely claiming to be DEA agents advised **VICTIM #1** that a vehicle located near the Mexican border in Brownsville, Texas, contained cocaine and her bank information. The fraudsters then convinced **VICTIM #1** to surrender half the cash in her bank accounts in good faith until a thorough investigation had been completed to clear her name of any criminal activity. Upon completion of the investigation, **VICTIM #1**'s money would be returned and **VICTIM #1** would receive an official letter from the DEA clearing her name.

10. From May 2, 2019, through May 21, 2019, **VICTIM #1** withdrew approximately \$238,400 cash from her bank accounts and sent eight FedEx packages containing the cash to addresses located in California and New Jersey at the direction of these individuals claiming to be DEA agents.

11. **VICTIM #1** made the following three cash withdrawals totaling \$8,500 at the direction of the individuals claiming to be DEA agents: (1) on May 22, 2019, \$4,000

cash from a Bank of America branch located at 13500 Harbour Pointe Parkway, Midlothian, Virginia; (2) on May 23, 2019, \$3,000 cash from a Bank of America branch located at 13500 Harbour Pointe Parkway, Midlothian, Virginia; and (3) on May 23, 2019, \$1,500 cash from a Virginia Credit Union branch located at 14520 Hancock Village Street, Chesterfield, Virginia.

12. On May 23, 2019, **VICTIM #1** then sent the \$8,500 cash via FedEx (tracking # 787443201636) to “ALDO RONALD” at a specific address located on Grey Widgeon Place (hereafter “the SUBJECT ADDRESS”), Eden Prairie, Minnesota, at the direction of the individuals claiming to be DEA agents.

13. From May 28, 2019, through June 17, 2019, **VICTIM #1** sent an additional \$163,200 cash via ten FedEx packages to various addresses located in New Jersey, Indiana, Texas, and Illinois at the direction of the individuals claiming to be DEA agents.

14. On or about May 20, 2019, **VICTIM #2**, a 77-year-old male from Nevada, was scammed into sending two FedEx packages (one of the tracking # 787365220758) to “NIKOL GESPER” of the SUBJECT ADDRESS, Eden Prairie, Minnesota, containing a total of \$39,000 cash.

15. On or about May 23, 2019, and May 24, 2019, **VICTIM #3**, an 86-year-old male from Ohio, was scammed into sending two UPS packages (tracking # 1Z1EW2894100124562 and tracking # 1Z1EW2891500124478) to “ALDO RONALD” of the SUBJECT ADDRESS, Eden Prairie, Minnesota, containing \$9,500 cash and \$20,000 cash respectively.

16. On or about May 16, 2019, **VICTIM #4**, an 82-year-old female from Washington, was scammed into sending a USPS package (tracking # EE459711324US) to

“RONALD ALDO”¹ of the SUBJECT ADDRESS, Eden Prairie, Minnesota, containing \$10,000 cash.

17. On or about June 5, 2019, **VICTIM #5**, a 69-year-old male from Kansas, was scammed into sending a FedEx package (tracking # 415061211237) to “KENNY S. TUKKI” at a Walgreens located at 10180 Hennepin Town Road, Eden Prairie, Minnesota, containing up to \$10,000 cash. An empty box with a FedEx label (tracking # 415061211237) addressed to “KENNY S. TUKKI” at Walgreens located at 10180 Hennepin Town Road, Eden Prairie, Minnesota, was also located at the SUBJECT ADDRESS, Eden Prairie, Minnesota, during the execution of a search warrant on June 14, 2019, which is discussed further below. Walgreens was able to provide surveillance photographs of Chirag Janakbhai Choksi, DOB [REDACTED]/1984 (hereafter “CHOKSI”), picking up a FedEx package (tracking # 415061211237) on June 6, 2019, to investigators with the Eden Prairie Police Department (“EPPD”), located in Eden Prairie, Minnesota.

18. On or about June 7, 2019, **VICTIM #6**, an 80-year-old female located in Massachusetts, was scammed into sending a FedEx package (tracking # 787738307625) to “KENNY S PUKKI” at a Walgreens located at 10180 Hennepin Town Road, Eden Prairie, Minnesota, containing \$9,500 cash. Walgreens was able to produce surveillance photographs of CHOKSI picking up FedEx package (tracking # 787738307625) on June 8, 2019, to investigators from the EPPD.

19. On or about June 6, 2019, **VICTIM #7**, a 76-year-old female in located in North Carolina, was scammed into sending a UPS package (tracking # 1Z1R722W0191439731) to “KENNY S PUKKI” at a Walgreens located at 10180

¹ It should be noted that victims sent packages addressed to both “ALDO RONALD” and “RONALD ALDO.”

Hennepin Town Road, Eden Prairie, Minnesota, containing \$6,500 cash. Walgreens was able to produce surveillance photographs of CHOKSI picking up UPS package (tracking # 1Z1R722W0191439731) on June 7, 2019, to investigators from the EPPD.

20. On June 13, 2019, officials with EPPD received a complaint from the niece of an 83-year-old female from Huntsville, Texas, **VICTIM #8**, who had been scammed for approximately \$9,000 cash. **VICTIM #8** had received a telephone call from an unidentified person claiming to be from the Social Security Administration (SSA). The unidentified caller then advised **VICTIM #8** that she owed \$9,000 in taxes to the SSA and if the money was not sent, two officers from the SSA would arrest her. The unidentified caller then instructed **VICTIM #8** to send cash via FedEx to “IVO E. HEISE” at a Walgreens located at 8240 Flying Cloud Drive, Eden Prairie, Minnesota. **VICTIM #8** withdrew \$8,900 cash from her bank account and sent the cash via FedEx Express Overnight (tracking # 106563788202) to “IVO E HEISE” at 8240 Flying Cloud Drive, Eden Prairie, Minnesota, on June 13, 2019.

21. On June 14, 2019, investigators from the EPPD, contacted the manager at Walgreens to discuss intercepting the FedEx package (tracking # 106563788202) sent by **VICTIM #8** to “IVO E. HEISE.” FedEx security advised the EPPD investigators that the FedEx package (tracking # 106563788202) had been flagged as fraud and had been re-routed back to **VICTIM #8**.

22. The manager at Walgreens then informed investigators from the EPPD that an additional FedEx package (tracking # 413039738541) was to be delivered to “IVO E. HEISE” from **VICTIM #9**, a 65-year-old female from Philadelphia, Pennsylvania. Investigators from the EPPD then set a surveillance perimeter on the exterior of the

Walgreens located at 8240 Flying Cloud Drive, Eden Prairie, Minnesota, and waited for an individual to pick up the FedEx package (tracking # 413039738541) addressed to “IVO E HEISE.”

23. At approximately 9:15 AM on June 14, 2019, an unknown male was observed entering Walgreens and picking up the package addressed to “IVO E. HEISE” by investigators from the EPPD. The unknown male, later identified as CHOKSI, was arrested by investigators from the EPPD upon exiting the Walgreens with the FedEx package sent by **VICTIM #9** and addressed to “IVO E. HEISE.”

24. A search incident to arrest revealed that CHOKSI possessed multiple Indian identifications cards. CHOKSI also possessed a counterfeit Pennsylvania driver’s license with the name of “IVO E. HEISE” with an address in Pittsburgh, Pennsylvania, that displayed CHOKSI’s photograph. The driver’s license in CHOKSI’s possession bore the valid Pennsylvania Operator License Number 24 309 808, which is legally assigned to an individual with the initials K.L.S. whose address is Melrose Park, Pennsylvania.

25. CHOKSI was then transported to the EPPD and interviewed by investigators from the EPPD. CHOKSI stated he resides at the SUBJECT ADDRESS, Eden Prairie, Minnesota, and had picked up three packages in the last week containing cash for his friend, PATHAN, who resides in India. PATHAN communicated with CHOKSI via WhatsApp messages. WhatsApp is a free, cross-platform communication application that may be installed on Apple, Android and Windows mobile phones, as well as Mac and Windows PC computers. WhatsApp enables users to securely communicate over the Internet with end-to-end encryption using a variety of formats, including video, voice calls and SMS (text) messaging. PATHAN would send CHOKSI details regarding

where to pick up packages and into what bank account to deposit the cash. CHOKSI deposited the cash into a Wells Fargo bank account(s) to help businesses avoid paying taxes. PATHAN provided him with the fraudulent driver's licenses from Pennsylvania to pick up packages in other individuals' names.

26. Following the arrest of CHOKSI, investigators from the EPPD obtained and executed a search warrant on CHOKSI's residence located at the SUBJECT ADDRESS, Eden Prairie, Minnesota, on June 14, 2019. The search yielded several items of evidentiary value to include:

- a. a Toshiba laptop;
- b. an empty box with a FedEx label (tracking # 415061211237) addressed to "KENNY S. TUKKI" at a Walgreens located at 10180 Hennepin Town Road, Eden Prairie, Minnesota, sent by **VICTIM #5**; and
- c. another empty box with a UPS label (tracking # 1Z1R722W0191439731) addressed to "KENNY PUKKI" located at 10180 Hennepin Town Road, Eden Prairie, Minnesota, sent by **VICTIM #7**.

27. On June 18, 2019, investigators from the EPPD obtained and executed a search warrant for CHOKSI's cellular telephone on his possession at the time of his arrest on June 14, 2019. A search of CHOKSI's cellular telephone identified substantial evidence linking both CHOKSI and PATHAN to the fraud scheme. As referenced below, CHOKSI received numerous WhatsApp messages from the number +919099752008. An FBI query of open source social media information revealed that this number was associated with a Facebook account subscribed in the name of a "Shehzad Khan" located in India. On August 8, 2019, investigators with EPPD obtained a search warrant for this Facebook account. A review of the search warrant returns, some of which are described

further below, demonstrates that the Facebook account belongs to the defendant, SHEHZADKHAN KHANDADKHAN PATHAN.

28. Specific forensic findings obtained from the search of CHOKSI's phone include, but are not limited to, the following:

- a. A WhatsApp message from PATHAN to CHOKSI which forwarded a photograph containing ten different Pennsylvania driver's licenses with CHOSKI's photograph for the following names: OLMEDO A TRYBULL, ACAVEDO R RAMOS, JORGE R MORTIZ, IVO E HEISE, BENJAMEN V PASSLACK, KENNY S PUKKI, SEBASTINO J SILVENO, GRANT M CANTENO, TIMOTHY D TETTEY, and MARCO L VRANCIC;
- b. A photograph of a FedEx package (tracking # 787443201636) sent by **VICTIM #1** to "ALDO RONALD" at the SUBJECT ADDRESS, Eden Prairie, Minnesota;
- c. A video of a FedEx package (tracking # 787443201636) sent by **VICTIM #1** to "ALDO RONALD" at the SUBJECT ADDRESS, Eden Prairie, Minnesota, being opened and approximately \$8,500 cash being removed from the box and counted. In the video of the FedEx package (tracking # 787443201636) being opened the foot of a woman is also capture on the video;
- d. A screen shot of the tracking information for a FedEx Package (tracking # 787365220758) and a photograph of a FedEx package (tracking # 787365220758) sent by **VICTIM #2** were both located on CHOKSI's cellular telephone;
- e. A WhatsApp message from PATHAN to CHOKSI, dated on or about May 24, 2019, forwarding **VICTIM #3's** name as "Sender," "Aldo Ronald" as "Receiver" at SUBJECT ADDRESS, Eden Prairie, Minnesota, and UPS tracking # 1Z1EW2894100124562. The message further stated, "Amt 9500 usd." [Note: **VICTIM #3** sent a UPS package (tracking # 1Z1EW2894100124562) to "ALDO RONALD" of the SUBJECT ADDRESS, Eden Prairie, Minnesota, containing \$9,500 cash on or about May 23, 2019.] CHOKSI replied, "Ok.";
- f. A video of **VICTIM #3's** UPS package (tracking # 1Z1EW2894100124562) being opened and approximately \$9,500 cash being removed from the box and counted, and a photograph of the second

UPS package (tracking # 1Z1EW2891500124478) sent by **VICTIM #3** were located on CHOKSI's cellular telephone;

- g. A WhatsApp message from PATHAN to CHOKSI, dated on or about May 25, 2019, forwarding information for Wells Fargo bank account # 1169985130 in the name of Ecommerce National, LLC in Scottsdale, Arizona. The message further stated, "Amt 20000\$ Cash";
- h. A WhatsApp message from PATHAN to CHOKSI, dated on or about May 25, 2019, forwarding information for Bank of America account # 466004112570 in the name of MIGA LIMITED;
- i. A photograph of a USPS missed delivery notification for the package sent by **VICTIM #4** to "ALDO RONALD" of the SUBJECT ADDRESS, Eden Prairie, Minnesota, was located on CHOKSI's cellular telephone;
- j. A WhatsApp message from PATHAN to CHOKSI, dated on or about June 5, 2019, forwarding **VICTIM #5's** name as "Sender Name," "Kenny S Pukki" as "Receiver Name," "Walgreens:10180 Hennepin Town Road, Eden Prairie, MN, 55347" as "Receiver Add," and FedEx tracking # 415061211237. The message further stated, "Amount- 8,200." [Note: **VICTIM #5** sent a FedEx package (tracking # 415061211237) to "KENNY S. TUKKI" at a Walgreens located at 10180 Hennepin Town Road, Eden Prairie, Minnesota, containing up to \$10,000 cash on or about June 5, 2019.];
- k. A screen shot of the tracking information for a FedEx package (tracking # 415061211237), a photograph of the FedEx package (tracking # 415061211237), and a video of the FedEx package (tracking # 415061211237) being opened and approximately \$10,000 cash being removed from the box and counted sent by **VICTIM #5** to "KENNY S. TUKKI" at Walgreens located at 10180 Hennepin Town Road, Eden Prairie, Minnesota, were located on CHOKSI's cellular telephone;
- l. A WhatsApp message from CHOKSI to PATHAN, dated on or about June 6, 2019, forwarding the same video of **VICTIM #5's** FedEx package being opened;
- m. A WhatsApp message from PATHAN to CHOKSI, dated on or about June 7, 2019, forwarding **VICTIM #6's** name as "Sender name," "Kenny S Pukki" as "Receiver name," "10180 Hennepin town road" as "Address," and FedEx tracking # 787738307625. The message further stated, "Amount

:9500usd.” [Note: **VICTIM #6** sent a FedEx package (tracking # 787738307625) to “KENNY S PUKKI” at a Walgreens located at 10180 Hennepin Town Road, Eden Prairie, Minnesota, containing up to \$9,500 cash on or about June 7, 2019.];

- n. A screen shot of the tracking information for a FedEx package (tracking # 787738307625), a photograph of a FedEx package (tracking # 787738307625), and a video of FedEx package (tracking # 787738307625) being opened and approximately \$9,500 cash being removed from the box and counted sent by **VICTIM #6** to “KENNY S PUKKI” at Walgreens located at 10180 Hennepin Town Road, Eden Prairie, Minnesota, were located on CHOKSI’s cellular telephone. In the video of the FedEx package (tracking # 787738307625), CHOKSI is seen opening the package and counting the money while the foot of a woman is captured on the video as well as the voice of a young child who is cooing and gurgling;
- o. A WhatsApp message from CHOKSI to PATHAN, dated on or about June 8, 2019, forwarding the same video of **VICTIM #6**’s FedEx package being opened. CHOKSI stated, “100x95=9500 approve”;
- p. A WhatsApp message from PATHAN to CHOKSI, dated on or about June 6, 2019, forwarding **VICTIM #7**’s name and address as “senders info,” “KENNY S PUKKI” and “Walgreens address : 10180 hennepin town road Eden prairie, MN, 55347” as “receiver info,” and UPS tracking # 1Z1R722W0191439731. The message further stated, “amount:- \$6500.” [Note: **VICTIM #7** sent a UPS package (tracking # 1Z1R722W0191439731) to “KENNY S PUKKI” at a Walgreens located at 10180 Hennepin Town Road, Eden Prairie, Minnesota, containing \$6,500 cash on or about June 6, 2019.];
- q. Three screen shots of tracking information for the UPS package (tracking # 1Z1R722W0191439731), a photograph of a UPS package (tracking # 1Z1R722W0191439731), and a video of a UPS package (tracking # 1Z1R722W0191439731) being opened and approximately \$6,500 cash being removed from the box and counted sent by **VICTIM #7** to “KENNY S PUKKI” at Walgreens located at 10180 Hennepin Town Road, Eden Prairie, Minnesota, were located on CHOKSI’s cellular telephone;
- r. A WhatsApp message from CHOKSI to PATHAN, dated on or about June 7, 2019, forwarding the same video of **VICTIM #7**’s UPS package being opened;

- s. A WhatsApp message from PATHAN to CHOKSI, dated on or about June 13, 2019, forwarding **VICTIM #8**'s name and address as sender, "ivo E Heise, 8240 flying cloud dr Eden prairie MN 55344" as receiver, and FedEx tracking # 106563788202. [Note: **VICTIM #8** sent a FedEx package (tracking # 106563788202) to "IVO E. HEISE" at a Walgreens located at 8240 Flying Cloud Drive, Eden Prairie, Minnesota, containing \$8,900 cash on or about June 12, 2019.];
- t. A screen shot of tracking information for a FedEx package (tracking # 106563788202) sent by **VICTIM #8**;
- u. A WhatsApp message from PATHAN to CHOKSI, dated on or about June 13, 2019, forwarding **VICTIM #9**'s name as "Sender name," "Ivo.E.heise Walgreens 8240 flying cloud drive Eden prairie MN 55344" as "RECEIVER," and FedEx tracking # 413039738541. The message further stated, "AMNT- \$9000." [Note: **VICTIM #9** sent a FedEx package (tracking # 413039738541) to "IVO E. HEISE" at a Walgreens located at 8240 Flying Cloud Drive, Eden Prairie, Minnesota, containing \$9,000 cash.];
- v. Additional photographs, screen shots, and videos of packages being opened and containing large sums of cash sent via FedEx and UPS, which led to the identification and interviews of six additional victims located in Nevada, Ohio, Washington, Kansas, Massachusetts, and North Carolina.

29. On July 1, 2019, CHOKSI was interviewed by investigators from the FBI and the EPPD at a United States Immigration and Customs' Enforcement and Removal Office located in Fort Snelling, Minnesota, while in custody for overstay charges. CHOKSI stated he never lived in Pennsylvania and that he, his wife, Shachi Naishadh Majmudar, DOB [REDACTED]/1983 (hereafter "MAJMUDAR"), and their four-month-old child are the only individuals to reside at the SUBJECT ADDRESS, Eden Prairie, Minnesota. CHOKSI agreed to accept cash in the United States for PATHAN's LED light business located Ahmedabad, India. CHOKSI claimed to only have accepted three or four FedEx packages for PATHAN within the last week that contained a total of approximately \$27,000 cash. CHOKSI deposited the cash into Wells Fargo and/or Bank of America

accounts for PATHAN. CHOKSI stated that PATHAN provided him with approximately two Pennsylvania driver's licenses because banks would not allow CHOKSI to deposit funds with an expired passport. The driver's licenses were in other people's names, which CHOKSI claimed made him suspicious, but he needed money. CHOKSI also used the Pennsylvania driver's licenses to pick up FedEx packages. CHOKSI videotaped the opening and counting of the cash in the FedEx packages as proof to PATHAN of the amount of cash contained in the FedEx packages. CHOKSI also stated that MAJMUDAR did not know anything about any of the cash he received via FedEx for PATHAN in India.

30. MAJMUDAR was also interviewed by an investigator with the EDPD during the search of the residence located at the SUBJECT ADDRESS, Eden Prairie, Minnesota, on June 14, 2019. MAJMUDAR stated that neither she nor CHOKSI currently worked. MAJMUDAR also denied any knowledge of CHOKSI receiving FedEx packages, CHOKSI collecting money, and/or CHOKSI sending money to India.

31. On June 14, 2019, investigators from the EPPD obtained and executed a search warrant for MAJMUDAR's cellular telephone in her possession at the time the search warrant was executed on her residence located at the SUBJECT ADDRESS, Eden Prairie, Minnesota. The digital evidence recovered from MAJMUDAR's cellular telephone included, but was not limited to, the following:

- a. A screen shot of FedEx tracking information for **VICTIM #9**;
- b. A log of telephone calls between MAJMUDAR and PATHAN on June 14, 2019, after CHOKSI was arrested by EPPD;
- c. A photograph of the UPS package (tracking # 1Z1EW2891500124478) sent by **VICTIM #3** to "ALDO RONALD" of the SUBJECT ADDRESS, Eden Prairie, Minnesota;

- d. Three photographs of addresses for additional Walgreens located at (1) 16395 Wagner Way, Eden Prairie, Minnesota, (2) 1291 Tasha Drive, Shakopee, Minnesota, and (3) 8100 W County Road 42, Savage, Minnesota;
- e. Three photographs of different deposit slips for (1) \$9,500, (2) \$9,500, and (3) \$1,000 deposits into Wells Fargo bank account # 1169985130 on May 25, 2019, and each deposit consisting of loose currency cash in the denominations of \$100 bills totaling \$20,000 [*Note: VICTIM #3 sent a UPS package (tracking # 1Z1EW2891500124478) to "ALDO RONALD" of the SUBJECT ADDRESS, Eden Prairie, Minnesota, containing \$20,000 cash on May 24, 2019. On May 25, 2019, PATHAN sent CHOKSI a WhatsApp message forwarding information for Wells Fargo bank account # 1169985130 in the name of Ecommerce National, LLC, stating, "Amt 20000\$ Cash."*];
- f. MAJMUDAR conducted searches on her cellular telephone for a USPS package on May 17, 2019, and May 18, 2019 [*Note: VICTIM #4's package was supposed to be delivered to the SUBJECT ADDRESS, Eden Prairie, Minnesota, on May 17, 2019*];
- g. Photographs of a deposit slips for separate \$6,130 and \$9,500 deposits into Bank of America account # 466004112570 in the name of MIGA LIMITED on May 28, 2019;
- h. Photograph of a Wells Fargo deposit slip for \$5,000 on June 7, 2019;
- i. Photograph of a Bank of America deposit slip for \$8,930 on June 11, 2019.

32. On July 29, 2019, a Trooper from the Pennsylvania State Police confirmed the ten Pennsylvania driver's licenses on CHOKSI's person and/or on his cellular telephone were counterfeit. A state issued driver's license number is expressly listed as a "means of identification" in 18 U.S.C. § 1028(d)(7)(A). All of the licenses listed below bore CHOKSI's photography. The license information is provided as follows:

Displayed Name on Driver's License	Pennsylvania Operator License Number	Initials of True Name to Whom License Issued
Ivo E Heise	24 309 808	K.L.S.

Displayed Name on Driver's License	Pennsylvania Operator License Number	Initials of True Name to Whom License Issued
Olmedo A Trybull	24 309 806	C.T.R.
Acavedo R Ramos	24 309 085	L.P.J.
Jorge R Mortiz	24 309 089	R.R.
Benjamin V Passlack	24 309 804	R.S.R.
Kenny S Pukki	24 309 091	C.E.D.
Sebastino J Silveno	24 309 087	K.A.D
Grant M Canteno	24 309 810	E.T.U.
Timothy D Tettey	24 309 102	Z.J.W.
Marco L Vrancic	24 309 095	No Record Found

33. As discussed above, on August 8, 2019, investigators from the EPPD obtained and executed a search warrant for PATHAN's Facebook account. The digital evidence recovered from PATHAN's Facebook account included, but was not limited to, the following:

- a. The following photograph of PATHAN, CHOKSI, and MAJMUDAR together with another unidentified female, uploaded on December 11, 2015:



[Note: PATHAN is pictured in the front of the photograph, while CHOKSI is in the very back. MAJMUDAR is positioned third from the front (i.e., directly in front of CHOKSI);

- b. A screenshot sent by PATHAN to CHOKSI's Facebook account on June 14, 2019, stating "7000 courier done with same customer of yesterday 9000\$ client." The screenshot further included **VICTIM #9's** name as "Senders-name," a Walgreens address in Niles, Illinois, a redacted FedEx tracking number, and stated, "AMNT- \$7000." *[Note: In addition to the FedEx package picked up by CHOKSI, **VICTIM #9** sent a second FedEx package to Niles, Illinois, containing \$7,000 cash.];*
- c. Photographs sent by CHOKSI's Facebook account on June 14, 2019, including a photo of the search warrant executed by investigators from the EPPD on CHOKSI's residence located at the SUBJECT ADDRESS, Eden Prairie, Minnesota, and a business card of one of the EPPD investigators.

[Note: CHOKSI was in custody at the time the photographs were sent, therefore, it appears likely that MAJMUDAR sent the photographs to PATHAN while utilizing CHOKSI's Facebook account].

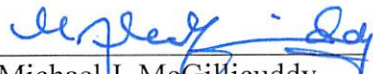
34. On December 4, 2019, PATHAN arrived at George Bush Intercontinental Airport (IAH) aboard Emirates Airlines flight EK 211 from Ahmedabad, Gujarat, India via Dubai, UAE. PATHAN was referred to Passport Control Secondary for additional questioning due to a positive match to a lookout provided by the FBI. During secondary inspection, PATHAN stated he is traveling to the U.S. for vacation and will be departing the U.S. on January 13, 2020. PATHAN provided customs inspectors with information about his itinerary and whereabouts while in the United States. PATHAN told inspectors that his phone number is +919099752008, which matches the phone number described in paragraph 27 above.

CONCLUSION

35. Based on the information detailed above, I make this affidavit in support of a criminal complaint charging SHEHZADKHAN KHANDADKHAN PATHAN with: mail fraud, and aiding and abetting mail fraud, in violation of 18 U.S.C. §§ 1341 and 2; conspiracy to commit mail and wire fraud, in violation of 18 U.S.C. § 1349; and

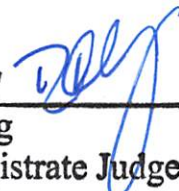
aggravated identity theft, and aiding and abetting aggravated identity theft, in violation of
18 U.S.C. §§ 1028A and 2.

Respectfully Submitted,



Michael J. McGillicuddy
Special Agent
Federal Bureau of Investigation

SUBSCRIBED and SWORN before me this 9th day of December 2019.



/s/
Roderick C. Young
United States Magistrate Judge